

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Lordstown Motors Corp., *et al.*,

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

Jointly Administered

Re: D.I. 358

**CERTIFICATE OF NO OBJECTION REGARDING MOTION TO FILE
UNDER SEAL (I) REPLY IN FURTHER SUPPORT OF MOTION OF
HON HAI PRECISION INDUSTRY CO., LTD. (A/K/A HON HAI
TECHNOLOGY GROUP), FOXCONN EV TECHNOLOGY, INC., AND
FOXCONN EV SYSTEM LLC TO DISMISS, OR, IN THE ALTERNATIVE,
CONVERT THE BANKRUPTCY CASES AND (II) DECLARATION OF
MICHAEL C. WHALEN**

The undersigned hereby certifies that, as of the date hereof, Morris, Nichols, Arshzt & Tunnell LLP (“Morris Nichols”), as co-counsel to Hon Hai Precision Industry Co., Ltd. (a/k/a Hon Hai Technology Group), Foxconn EV Technology, Inc., and Foxconn EV System LLC (collectively, “Foxconn”) has received no answer, objection or other responsive pleading to the *Motion to File Under Seal (I) Reply in Further Support of Motion of Hon Hai Precision Industry Co., Ltd. (a/k/a Hon Hai Technology Group), Foxconn EV Technology, Inc., and Foxconn EV System LLC to Dismiss, or, in the Alternative, Convert the Bankruptcy Cases and (II) Declaration of Michael C. Whalen* (D.I. 358) (the “Motion”), filed on August 31, 2023.

The undersigned further certifies that Morris Nichols has caused the review of the Court’s docket in this case and that no answer, objection or other responsive pleading to the Motion appears thereon. Pursuant to the Motion, objections to the Motion were to be filed and served no later than September 14, 2023, at 4:00 p.m. (ET).

WHEREFORE, Morris Nichols respectfully requests that the Final Order attached to the Motion be entered at the earliest convenience of the Court.

Dated: September 27, 2023
Wilmington, Delaware

**MORRIS, NICHOLS, ARSHT &
TUNNELL LLP**

/s/ Matthew O. Talmo

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